



U.S. Department of Justice

United States Attorney
District of New Jersey
Civil Division

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Via Electronic Filing

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: *Puello v. United States Postal Service, et al.*
Civil Action No. 18-13714 (CCC)(CLW)

Dear Judge Waldor:

I am the Assistant United States Attorney representing Defendant the United States Postal Service in this case. I respectfully write to request a stay of expert discovery so that Defendant may file a motion for summary judgment.

The parties have now completed fact discovery. Before expending time and resources on expert discovery, which will go solely to the issue of damages, Defendant intends to file a motion for summary judgment on the issue of liability. Counsel for Plaintiff declined his consent to our request to stay expert discovery for this purpose. Accordingly, Defendant requests that the Court stay expert discovery so that Defendant may file a motion for summary judgment. Further, given that I am new to this case, I ask that the motion not be due until April.

I thank the Court for its consideration of this request.

Respectfully submitted,

RACHAEL A. HONIG
Acting United States Attorney

By: s/ Angela E. Juneau
ANGELA E. JUNEAU
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cc: Joseph Rakofsky, Esq. (via electronic filing)